UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

WinRed, Inc.,

Court File No. 0:21-cv-01575 (JRT/BRT)

Plaintiff,

VS.

DEFENDANTS'
MOTION TO DISMISS
PLAINTIFF'S COMPLAINT

Keith Ellison, in his official capacity as Attorney General for the State of Minnesota; Letitia James, in her official capacity as Attorney General for the State of New York; William Tong, in his official capacity as Attorney General for the State of Connecticut; and Brian Frosh, in his official capacity as Attorney General for the State of Maryland,

Defendants.

Defendants, Keith Ellison, in his official capacity as Attorney General for the State of Minnesota, Letitia James, in her official capacity as Attorney General for the State of New York, William Tong, in his official capacity as Attorney General for the State of Connecticut, and Brian Frosh, in his official capacity as Attorney General for the State of Maryland, move the Court to dismiss Plaintiff's Complaint for lack of personal jurisdiction and failure to state a claim. This motion is made pursuant to Fed. R. Civ. P. 12(b)(2) and 12(b)(6) and is based upon the files, records, and proceedings herein, including the memorandum of law filed and served with this motion.

Dated: July 29, 2021 Respectfully submitted,

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State of Minnesota

s/ James W. Canaday
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